This index includes all the material published in *Practical Tax Strategies*, Volume 76, January 2006-June 2006

ACCOUNTING

Accounting method change for capitalization of intangibles, 76 PTS 120, Feb06

Achieve capital gain treatment for intellectual property, *by Craig J. Langstraat, John M. Malloy,* and Courtney Brock, 76 PTS 83 Feb06

Advance consent for cost capitalization method change, 76 PTS 119, Feb06

Automobile deduction limits shift upward for 2006, 76 PTS 309, May06

Final regs. on qualified settlement funds and related accounts, 76 PTS 182, Mar06

Intangibles swap not a like-kind exchange, 76 PTS 65, Feb06

Tax rules for escrow accounts used in like-kind exchanges, 76 PTS 181, Mar06

COMPENSATION

Maximum 2006 car values for simplified method, 76 PTS 129, Mar06

Performance-based pay can be paid in other events, 76 PTS 312, May06

Prop. regs. offer complex guidance on deferred pay (part I), *by Barry L. Salkin*, 76 PTS 4, Jan06

Prop. regs. offer complex guidance on deferred pay (part II), *by Barry L. Salkin*, 76 PTS 68, Feb06

CORPORATIONS

A DISC offers tax planning advantages for small exporters, *by Jim Lynch*, 76 PTS 132, Mar06

Advances were loans not equity contributions, 76 PTS 364, Jun06

Business purpose averts tax on debt transfer to corporation, *by Mark A. Turner and Mandra Fagan*, 76 PTS 156, Mar06

Final regs. define statutory mergers and consolidations, 76 PTS 190, Mar06

IRS issues final regs. on consolidated return loss duplication, 76 PTS 367, Jun06

Prop. regs. tighten corporate estimated tax rules, 76 PTS 112, Feb06

Regs. use tracing method for basis of stock received in reorganization, 76 PTS 234, Apr06

Splitting business almost created PSC, 76 PTS 233, Apr06

Stock sale between brothers was an ownership change, 76 PTS 113, Feb06

Valuation firm is not a PSC, 76 PTS 129, Mar06

ESTATE PLANNING

Annuity distribution was not income in respect of decedent, 76 PTS 303, May06

Distribution to charity removed split-interest problem, 76 PTS 51, Jan06

Estate could not make QTIP election for improperly disclaimed property, 76 PTS 307, May06

Family's buy-sell agreement sets estate property value, 76 PTS 369, Jun06

Formula clause coupled with disclaimer could raise estate tax, *by Ted D. Englebrecht and Wei-Chih Chiang*, 76 PTS 23, Jan06

Gifts to country club were not excludable gifts to each member, 76 PTS 250, Apr06

IRA's estate tax value not reduced for beneficiary's tax, 76 PTS 48, Jan06

IRS entitled to recoup portion of refund to estate, 76 PTS 306, May06

Key concerns in servicing ultra-aged, mentally-impaired clients, *by Caroline K. Craig and Thomas R. Craig*, 76 PTS 284, May06

No marketability discount for restrictive FLP provision, 76 PTS 50, Jan06

Prepaying grandkids' tuition avoids transfer tax, 76 PTS 247, Apr06

Spousal interests in GRATs were not qualified interests, 76 PTS 304, May06

Timing of gift to FLP counts, 76 PTS 65, Feb06

Transferred residence included in decedent's estate, 76 PTS 248, Apr06

Water right conveyance did not scuttle special-use valuation, 76 PTS 247, Apr07

PARTNERSHIPS

Catch up on employment tax concepts of pass-through entities, *by Darshan Wadhwa*, 76 PTS 216, Apr06

Combat zone tax relief does not extend to partnership, 76 PTS 318, May06

Partnership, not partner, may deduct settlement payment, 76 PTS 126, Feb06

Prop. regs. tackle compensatory partnership interest issues, *by Magda B. Szabo*, 76 PTS 196, Apr06

Prop. regs. test substantiality of partnership allocations, 76 PTS 125, Feb06

TEFRA rules inapplicable to payment to subsidiary's partnership, 76 PTS 318, May06

PERSONAL

AMT capital loss cannot be carried back, 76 PTS 362, Jun06

Breaking up is hard to do: identifying alimony may add tax tiffs, *by Randy Serrett and Steven C. Thompson*, 76 PTS 162, Mar06

California domestic partners cannot split income on returns, 76 PTS 254, Apr06

Dentist not permitted to deduct losses from horse breeding activity, 76 PTS 113, Mar06

Disabled access tax credit disallowed, 76 PTS 116, Feb06

Ensure deductibility of expenses from hobby-like activities, *by Tom Moore*, 76 PTS 224, Apr06

Get credit for hybrid cars, 76 PTS 257, May06

Grazing permit waiver was not charitable contribution, 76 PTS 254, Apr06

Hurricane tax relief provisions have nationwide implications, *by Philip J. Harmelink and William M. VanDenburgh*, 76 PTS 96, Feb06

IRS announces standard mileage rates for 2006 car use, 76 PTS 54, Jan06

IRS denies medical expense deduction for sex change operation, 76 PTS 177, Mar06

Lottery winner loses tax dispute, 76 PTS 321, Jun06

Make best use of the state and local sales tax deduction, *by Steve Harrington*, 76 PTS 32, Jan06

Mechanics of hybrid car credit eligibility, 76 PTS 65, Feb06

No theft or capital loss from loan guarantee, 76 PTS 176, Mar06

Religious school tuition was not charitable contribution, 76 PTS 116, Feb06

Roundup of significant income tax developments in 2005 *by Matthew A. Melone*, 76 PTS 36, Jan06

Settled credit card debt was discharge of debt income, 76 PTS 173, Mar06

Special schooling tuition may be a deductible medical expense, *by Craig J. Langstraat, John M. Malloy,* and Courtney Brock, 76 PTS 279, May06

Structure scholarships to exempt room and board from tax, *by Joseph M. Hargadon, Gregory P. Cermignano, and Nicole G. Santomero*, 76 PTS 295, May06

Taxation of disability benefits depends on how premiums are paid, 76 PTS 315, May06

Tax implications of home down-payment assistance programs, 76 PTS 359, Jun06

Thresholds rise in 2006 with inflation adjustments, 76 PTS 53, Jan06

Timing of tuition payment affects credit eligibility, 76 PTS 314, May06

Uniform definition of 'child' alters tax benefits eligibility, *by Timothy R. Koski*, 76 PTS 89, Feb06

PRACTICING BEFORE THE IRS

Deadline extended for voluntary compliance program, 76 PTS 44, Jan06

Identifying adequate income return disclosure, 76 PTS 171, Mar06

IRS not barred from assessing deficiencies, 76 PTS 301, May06

Significant book-tax differences removed, 76 PTS 170, Mar06

Small employer program established, 76 PTS 230, Apr06

Taxpayer remittance with extension was payment, not deposit, 76 PTS 300, May06

PROCEDURE

Capital loss ignored when figuring if income omission is substantial, 76 PTS 243, Apr06

Charity not at this home program, 76 PTS 193, Apr06

Collection action halted without deficiency notice, 76 PTS 374, Jun06

Complexity of return supported innocent spouse relief, 76 PTS 240, Apr06

Employers get drawn into IRS effort to collect tax on tips, *by Barry Duman and Darlene Pulliam*, 76 PTS 345, Jun06

Interest rates still unchanged, 76 PTS 193, Apr06

Interest rates unchanged, 76 PTS 1, Jan06

IRS outlines prohibited political activities for exempts, 76 PTS 243, Apr06

IRS tax accrual workpapers requests: an (un)limited expansion?, *by John K. Cook*, 76 PTS 260, May06

Looking ahead to the 2007 filing season: more e-filing required, *by Les Witmer*, 76 PTS 355, Jun06

New regs. provide automatic six-month filing extensions, 76 PTS 62, Jan06

No standing to appeal ex-wife's innocent spouse relief, 76 PTS 187, Mar06

Penalties seek to ensure confidentiality of income tax returns, *by Michael Schlesinger*, 76 PTS 324, Jun06

Prop. regs. update return preparer's disclosure rules, 76 PTS 1, Jan06

Proposed regulations modify Circular 230 requirements, 76 PTS 185, Mar06

Safeguards for private debt collection initiative, 76 PTS 193, Apr06

Taxpayer was liable for embezzled payroll taxes, 76 PTS 242, Apr06

Venue rules present forum choices for settling tax disputes, *by Robert E. Blatz*, 76 PTS 203, Apr06

Voluntary inquiry is not an audit, 76 PTS 257, May06

QUALIFIED PLANS

Daughter's illness extended IRA rollover deadline, 76 PTS 257, May06

Early distribution penalty did not apply to disabled taxpayer, 76 PTS 372, Jun06

Extra tax applies to 401(k) payout despite financial hardship, 76 PTS 311, May06

Final regulations issued on Roth 401(k) contributions, 76 PTS 108, Feb06

IRA penalty exceptions do not apply to 401(k), 76 PTS 1, Jan06

IRA periodic payments not penalized for wrong rollover, 76 PTS 373, Jun06

Okay to roll over 401(k) loan amount, 76 PTS 321, Jun06

Periodic payments avoid penalty on early retirement distributions, *by William C. Hood*, 76 PTS 269, May06

Prop. regs. outline Roth 401(k) distribution rules 76 PTS 178, Mar06

Roth 401(k) advantage surfaces in retirement and beyond, *by Clay M. Grayson*, 76 PTS 148, Mar06

Safe harbor to determine value of annuity in Roth conversion, 76 PTS 110, Feb06

Self-directed IRA expands investment possibilities and perils, *by Hugh Bromma*, 76 PTS 337, Jun06

REAL ESTATE

Coal supply contracts and mines were like-kind property, 76 PTS 379, Jun06

Death threat justifies waiving two-year rule for home-safe exclusion, 76 PTS 381, Jun06

Employer home purchase program may be compensation, 76 PTS 56, Jan06

Expenses related to dual-use portion of inn were not deductible, 76 PTS 238, Apr06

Home-sale exclusion extends to co-owner, 76 PTS 129, Mar06

IRS guidance on homeowner energy tax credits, 76 PTS 237, Apr06

Recent rulings take favorable positions on taxation of REITS, *by Joy S. Macintyre and Susan A. Kim*, 76 PTS 352, Jun06

Related parties can engage in tax-free like-kind exchange, 76 PTS 378, Jun06

Timberland exchange involves like-kind properties, 76 PTS 58, Jan06

S CORPORATIONS

S corporation family shareholder election, 76 PTS 124, Feb06

S corporation scores higher interest rate, 76 PTS 321, Jun06

AUTHOR INDEX

Robert E. Blatz 203
Courtney Brock 83, 279
Hugh Bromma 337
Gregory P. Cermignano 295
Wei-Chih Chiang 23
John K. Cook 260
Caroline K. Craig 284
Thomas R. Craig 284
Barry Duman 345
Ted D. Englebrecht 23
Mandra Fagan 156
Clay M. Grayson 148
Joseph M. Hargadon 295
Philip J. Harmelink 96
Steve Harrington 32
William C. Hood 269
Susan A. Kim 352
Timothy R. Koski 89
Craig J. Langstraat 83, 279
Jim Lynch 132
Joy S. MacIntyre 352
John M. Malloy 83, 279
Matthew A. Melone 36
Tom Moore 224
Dariene Pulliam 345
Barry L. Salkin 4, 68
Nicole G. Santomero 295
Michael Schlesinger 324
Randy Serrett 162
Magda B. Szabo 196
Steven C. Thompson 162
Mark A. Turner 156
William M. VanDenburgh 96
Darshan Wadhwa 216
Les Witmer 355